

SUPPORTING STATEMENT
for

Application for Merchant Mariner Credential (MMC), Application for Merchant Mariner Medical Certificate, Application for Merchant Mariner Medical Certificate for Entry Level Ratings, Small Vessel Sea Service Form, DOT/USCG Periodic Drug Testing Form, Disclosure Statement for Narcotics, DWI/DUI, and/or Other Convictions, Merchant Mariner Medical Certificate, Recognition of Foreign Certificate

OMB CONTROL NO.: 1625-0040

COLLECTION INSTRUMENTS: CG-719B, CG-719K, CG-719K/E, CG-719S, CG-719P, CG-719C.

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

Title 46, Code of Federal Regulations (CFR), parts 10, 11, 12, 13, and 16, and International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended (STCW Convention) and the STCW Code, including the STCW Final Rule (Docket No. USCG-2004-17914) published on December 24, 2013, mandate that each applicant for a Merchant Mariner Credential (MMC) or Medical Certificate make written application to the Coast Guard (CG-719B); present a completed Coast Guard physical examination report (CG-719K or CG-719K/E) executed by a physician, attesting to the applicant's medical fitness to perform the functions for the credential sought; provide documentary evidence of sea service on vessels (CG-719S); provide evidence of having passed a chemical test for dangerous drugs (CG-719P); and as needed, provide a statement for Narcotics, DWI/DUI, and/or Other Convictions (CG-719C).

The changes to the forms in this collection are not associated with new statutory or regulatory authority, but rather improvements to the flow and quality of content, user functionality, and to aid the Coast Guard in processing applications.

2. Indicate how, by whom, how frequently, and for what purposes the information is to be used and the consequence to the Federal program or policy activities if the collection of information was not conducted.

The Coast Guard will evaluate the collection of information against applicable statutes, regulations and policies solely for the purposes of determining eligibility for issuance of an MMC and/or Medical Certificate. This evaluation is performed on occasion, meaning as submitted by the respondent when he or she applies for an MMC or Medical Certificate every year, 2 years, or 5 years, as applicable. Per the CFR, the Coast Guard requires the information to process applications and issue MMCs or Medical Certificates to applicants who can prove their medically qualified, and whose background, training

and certifications can be verified to ensure security and safety related requirements are met. This information assists the Coast Guard in its effort to help secure U.S. ports, waterways, marine infrastructure, and marine-related commercial activities, including international trade, by protecting the Merchant Mariner Credentialing Program from abuse or fraud. Additionally, much of the information collected is stored in the Merchant Mariner Licensing and Documentation database, which is used during the evaluation of future MMC and Medical Certificate applications.

3. Describe whether the collection of information involves the use of automated collection techniques.

The forms under this collection are available in a .pdf-fillable version. The Coast Guard continues to work towards developing a system that will allow respondents to submit electronically. The Coast Guard implemented email submission of application packages to Regional Examination Centers (RECs) in January 2010. The Coast Guard also accepts submissions by fax and mail.

4. Describe efforts to identify duplication.

As the requirements for a Coast Guard MMC and Medical Certificate are unique and very specific, no duplication of information collected is known. The forms within this collection are the only instruments available that specifically address the requirements for issuance of a Coast Guard MMC or Medical Certificate. No other Federal, State, or Local agencies collect this information.

5. If the collection of information impacts small businesses or other small entities describe the methods used to minimize burden.

The information collection does not impact small businesses.

6. Describe the consequences to the Federal program or policy activities if the collection were not conducted or conducted less frequently.

The Coast Guard is mandated by law to issue MMCs and Medical Certificates to individuals found qualified as to age, character, habits of life, experience, professional qualifications, and physical fitness. Without the ability to collect this information the Coast Guard would not be able to adhere to statutory and regulatory requirements.

7. Explain any special circumstances.

No special circumstances exist for this collection of information.

8. Solicitation of Comments.

A 60-day Notice will be published in the *Federal Register* to obtain public comment on this collection.

9. Explain any decision to provide any payment or gift to respondents.

No payments or gifts are provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Confidentiality is provided to respondents via a System of Records, 65 FR 19476-01, dated April 11, 2000.

11. Provide additional justification for any questions of a sensitive nature.

There is no “sensitive nature” information collected.

12. Provide estimates of the hour burden of the collection of information.

On average, the Coast Guard receives approximately 56,500 applications (CG-719B) annually. An application (CG-719B) itself takes approximately 9 minutes to complete, and may be e-mailed, faxed, mailed or hand carried to a Regional Examination Center for processing. Applications are either accompanied by a CG-719K (18 minutes to complete/ used by ~80% of respondents) or CG-719K/E (10 minutes to complete/used by ~20% of respondents), which provide information for determining an applicant’s fitness for duty as a merchant mariner. In addition, it is estimated that another 12,000 mariners will apply for the Medical Certificate annually by completing the CG-719K (~80%) or CG-719K/E (~20%). The CG-719P (5 minutes to complete) and CG-719S (15 minutes to complete) are typically submitted with the applicant’s application as documentary evidence of having passed a chemical test for dangerous drug and evidence of sea service on vessels. The CG-719C, which is a new instrument in this collection, can be used when an applicant must disclose use of narcotics, DWI/DUI, and/or other convictions (10 minutes to complete). The CG-719C was created as an optional form to assist respondents who are legally required to disclose information to the Coast Guard.

The burden associated with the additional 12,000 respondents (CG-719K & CG-719K/E) discussed in the paragraph above was overlooked and not accounted for in the last Supporting Statement, but is accounted for in the table below.

Based on the table below, the total burden hours will be approximately 47,444, an increase of 3,186 from the previously approved Supporting Statement.

The estimate cost of the hour burden is \$1,488,508.06 (\$22.41 (wage data retrieved using U.S. BLS website) * 1.4 (loaded factor) * 47,444 hours).

CG-719B	
Annual applications (CG-719B) completed:	56,500
Time to complete a CG-719B:	9 minutes

Original Burden Hours:	8,475
Notification of Change from previous renewal:	0
Additional Burden Hours:	0
New Total Burden Hours for CG-719B:	8,475
CG-719K	
Estimated number of Application for Merchant Mariner Medical Certificate (CG-719K) (45,200 (80% of 56,500) + 9,600 (80% of 12,000/STCW)):	54,800
Time to complete a CG-719K:	18 minutes
Original Burden Hours:	13,560
Notification of Change from previous renewal:	2,880
Additional Burden Hours:	2,880
New Total Burden Hours CG-719K:	16,440
CG-719K/E	
Estimated number of Application for Merchant Mariner Medical Certificate for Entry Level Ratings (CG-719K/E) (11,300 (20% of 56,500) + 2,400 (20% of 12,000/STCW)):	13,700
Time to complete 1 CG-719K/E:	10 minutes
Original Burden Hours:	3,390
Notification of Change from previous renewal:	1,107
Additional Burden Hours:	0
New Total Burden Hours CG-719K/E:	2,283
CG-719S	
Estimated number of Small Vessel Sea Service Forms completed (CG-719S):	56,500
Time to complete 1 CG-719S:	15 minutes
Original Burden Hours:	14,125
Notification of Change from previous renewal:	0
Additional Burden Hours:	0
New Total Burden Hours for CG-719S:	14,125
CG-719P	
Estimated number of DOT/USCG Periodic Drug Testing Forms (CG-719P):	56,500
Time to complete 1 CG-719P:	5 minutes
Original Burden Hours:	4,708
Notification of Change from previous renewal:	0
Additional Burden Hours:	0

New Total Burden Hours for CG-719P:	4,708
CG-719C	
Estimated number of Disclosure Statement for Narcotics, DWI/DUI, and/or other Convictions (CG-719P) (15% of 56,500):	8,475
Time to complete 1 CG-719C:	10 minutes
Original Burden Hours:	0
Notification of Change from previous renewal:	1,413
Additional Burden Hours:	1,413
New Total Burden Hours for CG-719C:	1,413
New Total Burden Hours (CG-719B + CG-719K + CG-719K/E + CG-719S + CG-719P + CG-719C)	47,444

13. Provide estimates of the total annual cost burden to respondents.

There are no annualized capital and start-up costs.

14. Provide estimates of annualized cost to the Federal Government.

Expense Type	Expense Explanation	Annual Costs (dollars)
Direct Costs to the Federal Government	Evaluation of forms (point of receipt to approval or rejection of forms)	\$11,394,464
	Merchant Mariner License and Documentation database	\$800,000
	Shipping costs	\$14,993
	Safety and Suitability databases	\$31,303
	Subtotal, Direct Costs to the Government	\$12,240,760
Contractor Expenses	In-Processing of forms/Production of credential	\$2,488,896
	Subtotal, Contracted Services	\$2,488,896
	TOTAL COST TO THE GOVERNMENT	\$14,729,656

15. Explanation for Program Changes or Adjustments.

There is no change in burden. There is no proposed change to the reporting or recordkeeping requirements of this collection. The reporting and recordkeeping requirements, and the methodology for calculating burden, remain unchanged.

16. For collection of information whose results will be published.

There are no current plans to use the information for statistical purposes.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that displaying the expiration date would be inappropriate.

The OMB expiration date will be displayed on the CG-719B, CG-719K, CG-719K/E, CG-719S, CG-719P, and CG-719C, however, the CG-4610, CG-4610A, and CG-4610B are static credentials and certificates that are controlled and produced by the Coast Guard on a requested/approved basis.

18. Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submission”.

There are no exceptions.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS.

This information is not collected through the use of statistical methods.